

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

IN RE:	§	
	§	CASE NO. 21-11226-CTG
JAB ENERGY SOLUTIONS II, LLC	§	
	§	CHAPTER 11
Debtor.	§	

**C-DIVE, L.L.C.’S NOTICE OF WITHDRAWAL OF ITS OBJECTION
TO DEBTOR’S MOTION FOR APPROVAL OF THE PLAN TERM SHEET**

NOW INTO COURT, through undersigned counsel, comes C-Dive, L.L.C. (“C-Dive”) which files this Notice of Withdrawal of Its Objection to Debtor’s Motion for Approval of the Plan Term Sheet (P-297) (the “Objection”) and respectfully represents as follows:

1.

On July 27, 2022, JAB Energy Solutions II, LLC (the “Debtor” or “JAB”) filed its Motion for Approval of the Plan Term Sheet (the “Motion”) (P-278).

2.

On August 9, 2022, C-Dive filed its Objection to the Motion.

3.

The Official Committee of Unsecured Creditors filed its Statement in Support of Debtor’s Motion for Approval of the Plan Term Sheet (P-295) on August 9, 2022.

4.

Counsel for the Debtor filed the Certification of Counsel Regarding Debtor’s Motion for Approval of Term Sheet (P-296) with a proposed Order that addresses C-Dive’s primary objection

and clarifies that “nothing in the Plan Term Sheet or this Order shall limit any rights of non-settling parties...” Accordingly, the Order clarifies that other parties’ rights are protected. As a result, C-Dive withdraws its Objection.

5.

Counsel for C-Dive, Leann O. Moses, spoke with counsel for JAB, Laura Davis Jones, and advised her that this Notice would be filed. Ms. Moses also left a voice mail for Judicial Assistant Demitra Yaeger to notify her of same.

WHEREFORE, C-Dive, L.L.C. prays that this Honorable Court withdraw its Objection to the Debtor’s Motion for Approval of the Plan Term Sheet and for such other and further relief as this Court deems proper.

Dated: August 10, 2022

Respectfully submitted:

/s/ Peter J. Segrist

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Counsel for C-Dive, L.L.C.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing *Notice of Withdrawal of Objection to Motion for Approval of Plan Term Sheet* has been duly served upon those parties receiving electronic notification via the Court's CM/ECF System on this 10th day of August 2022.

/s/ Peter J. Segrist
PETER J. SEGRIST

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